



2PP

DEFENSE LOGISTICS AGENCY
HEADQUARTERS
8725 JOHN J. KINGMAN ROAD, SUITE 2533
FORT BELVOIR, VIRGINIA 22060-6221

REPLY
REFER TO

DSS-E

OPPT-2002-0013-0013

SEP 28 2001

Mr. Peter Gimlin
Environmental Protection Agency
Office of Pollution Prevention and Toxics
(Mail Code 7404)
401 M Street, SW
Washington, DC 20460

Dear Mr. Gimlin:

This letter concerns two petitions we submitted to your agency for exemptions under 15 U.S.C. 2605(e)(3)(B) that would permit us to import U.S. military-generated, foreign-manufactured polychlorinated biphenyls (PCBs) and PCB items into the United States for disposal.

On January 19, 2001, we submitted a petition for an exemption to import PCBs from Wake Island. We now wish to remove references to specific contractors from the petition, since other carriers and disposal firms may be used. Please replace paragraphs "a" and "b" of Section (6) with the enclosed paragraphs. The new paragraphs indicate that we will use approved carriers and disposal firms, but do not specify any particular companies.

On April 16, 2001, we submitted a similar petition to import PCBs from Japan, and on June 28, 2001, we sent you an update to the original inventory we provided with the petition. We would greatly appreciate your efforts to expedite both of our petitions.

Please let us know if there is anything we can do to assist you. My point of contact for this matter is Tom McKeirnan at (703) 767-6234.

Sincerely,

RICHARD J. CONNELLEY
Director
DLA Support Services

Enclosure

CONTAIN NO CBI



Revised Paragraphs for Wake Island Petition

(6) Risk of injury to health or environment:

- a. Packing, Import and Transportation. The material is currently "overpacked" in primary and secondary containers in a U.S. Government-owned storage facility. The material is packaged, marked, and labeled in accordance with international regulations and the International Maritime Dangerous Goods Code / International Maritime Organization. Proper handling and shipping shall include blocking, bracing, over packing, and inclusion of spill containment devices as required by applicable transportation regulations. The DLA will import the items on a U.S. flag vessel in accordance with applicable law. Following arrival in the United States, the property will be loaded for shipment on Department of Transportation (DoT) permitted carriers and transported for processing to an EPA-approved PCB disposal facility.
- b. Treatment and Disposal. DLA has considerable experience and expertise in awarding and administering disposal contracts for PCB waste in the United States. If EPA grants this exemption, DLA will use contracts with commercial firms providing such services in accordance with all applicable Federal procurement statutes and the Federal Acquisition Regulations (FAR). While it is preliminary to identify the specific companies, only those with the required Federal and state-permitted storage, treatment, and disposal facilities for dealing with PCBs and PCB items and wastes would be eligible for award of such contracts. Following its arrival in the United States, the material will be transported, handled, treated, and disposed of in conformance to the U.S. PCB regulations at 40 CFR 761. The PCB regulations set out specific treatment and disposal methods for PCBs and PCB items, depending on the type of item and the concentrations of PCB in the item or fluid. The contractor will recycle the metal components that can be decontaminated. If they are not decontaminated the metal components will be buried in a chemical waste landfill or incinerated. Used oils or liquids will be treated and disposed of by dechlorination or sent for energy recovery as fuels. Non-recyclable material will be disposed of as residual solid waste. Alternative disposal methods could be used if approved by the Administrator.